

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

STACEY MASAKO HAYWARD,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:25-cv-01606-DC-DMC

STIPULATION AND ORDER

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, with this Court's approval, to extend the time by 30 days, from October 6, 2025, to November 5, 2025, for the Commissioner to file his Cross-Motion for Summary Judgment. Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

This is the Commissioner's first request for an extension of time for his Cross-Motion. Plaintiff does not oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to staffing reductions and organizational changes, counsel for the Commissioner has been tasked with additional jurisdictional coordinator responsibilities,

1 taking work from other attorneys, and handling more cases, including the instant case, which was  
2 recently reassigned to her. Despite diligent efforts to manage her workload, counsel for the  
3 Commissioner therefore needs additional time in the instant case to review the substantial  
4 administrative record, consider the issues that Plaintiff has raised, confer with her client as  
5 necessary, and prepare the Commissioner's Cross-Motion.

6 Respectfully submitted,

7 Dated: September 29, 2025

LAW OFFICES OF FRANCESCO BENAVIDES

8 By: /s/ Francesco Benavides\*

9 FRANCESCO BENAVIDES

10 Attorneys for Plaintiff

[\*As authorized by e-mail on Sept. 29, 2025]

11 Dated: September 30, 2025

12 ERIC GRANT

13 United States Attorney

14 MATHEW W. PILE

15 Head of Program Litigation 1

Social Security Administration | Law & Policy

16 By: /s/ Margaret Branick-Abilla

17 MARGARET BRANICK-ABILLA

18 Special Assistant United States Attorney

Attorneys for Defendant

19 **ORDER**

20 Pursuant to the parties' stipulation, IT IS ORDERED that the Commissioner's Cross-  
21 Motion for Summary Judgment shall be due on November 5, 2025, and Plaintiff's optional reply  
22 shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

23 Dated: September 30, 2025

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25 DENNIS M. COTA

26 UNITED STATES MAGISTRATE JUDGE